



September 23, 2014

VIA ECF

Honorable Steven M. Gold, U.S.M.J.
U.S. District Court, EDNY
Brooklyn, New York 11201

**Re: Freire v. New York Motor Group LLC et al.
United States District Court, EDNY, Case No. 13-cv-7291**

**Dong v. New York Motor Group LLC et al.
United States District Court, EDNY, Case No. 14-cv-2980**

Dear Judge Gold:

This firm represents Santander Consumer USA, Inc. ("SCUSA"), a defendant in *Freire* and *Dong* -- two of six cases deemed related by the Court and referenced above. I write on behalf of SCUSA and Plaintiffs Mr. Freire and Ms. Dong and with their consent.

SCUSA and Plaintiffs Freire and Dong have reached a settlement agreement in principle, which, once finalized, would resolve these Plaintiffs' claims asserted against SCUSA only. While the parties memorialize the settlement agreement in writing, we request an order staying Plaintiffs' Motion for Leave to Amend their Complaints and SCUSA's Cross-Motion to Dismiss the Complaints for thirty days in *these two actions only*. If the Court approves this request, all dates related to these motions would be stayed immediately. Thank you for your consideration.

Respectfully,

/s/ Robert J. Brener

cc: Counsel of record (via ECF)

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